

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Orangeburg County
Court of General Sessions

Edgar W. Dickson, Circuit Court Judge

Case No. 2011-GS-38-1833
Appellate Case No. 2012-213006

STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

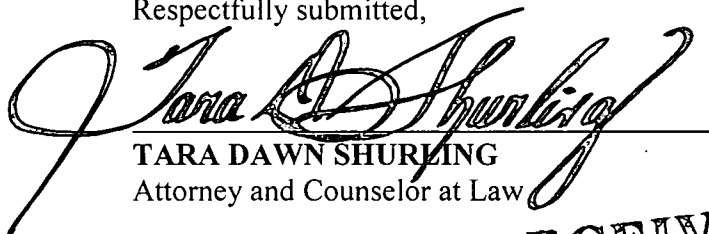
JULIAN C. YOUNG,

APPELLANT.

**APPELLANT'S MOTION
FOR EXTENSION OF TIME**

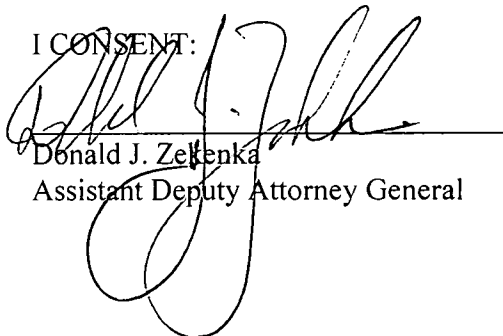
This case involves a direct appeal from Orangeburg County. My Initial Brief and Designation of Matter are due for filing on May 31, 2013. Because of my busy schedule, I will be unable to complete the preparation of this document by that date and respectfully request a 30-day extension of time in which to prepare and submit the Initial Brief and Designation of Matter on behalf of this client. Since this is my fourth extension request, opposing counsel, Donald J. Zelenka, Assistant Deputy Attorney General has signed this motion. (In compliance with *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, S. C. Sup. Ct. Order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1). I no longer have an associate in my law firm, and therefore can not have another lawyer in my firm certify the necessity of the extension. I do not anticipate any further extension requests for this stage of this appeal and appreciate the Court's consideration and patience.

Respectfully submitted,


TARA DAWN SHURLING
Attorney and Counselor at Law

ATTORNEY FOR APPELLANT

I CONSENT:


Donald J. Zelenka
Assistant Deputy Attorney General

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SC Court of Appeals

STATE OF SOUTH CAROLINA
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APPEAL FROM ORANGEBURG COUNTY
Court of General Sessions

Edgar W. Dickson, Circuit Court Judge

Case No. 2011-GS-38-1833
Appellate Case No. 2012-213006

STATE OF SOUTH CAROLINA,

Respondent,

vs.

JULIAN C. YOUNG,

Appellant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Appellant's Motion for Extension of Time to File the Initial Brief and Designation of the Matter in the above-entitled case has been served upon opposing counsel, Donald J. Zelenka, Assistant Deputy Attorney General, Office of the Attorney General, P O Box 11549, Columbia, SC 29211, by depositing in the U.S. Mail, postage prepaid, this 30th day of May, 2013.

Sharon McCollister

Sharon McCollister
Paralegal to Tara Dawn Shurling

SWORN TO BEFORE me this 30th day
of May, 2013.

Duianne Graham (S.)

Notary Public for South Carolina

My Commission Expires: 2/28/2023

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MAY 31 2013

SC Court of Appeals

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

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May 30, 2013

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: State of South Carolina v. Julian C. Young; 2011-GS-38-1833.
Case Tracking No.: 2012-213006

Dear Ms. Kitchings:

Enclosed please find for filing the original and six (6) copies of a Motion for Extension to File Initial Brief in the above captioned matter. The Initial Brief is due for filing on today's date. Opposing counsel, Donald J. Zelenka, Assistant Deputy Attorney General, has consented by his signature on the enclosed motion. I would appreciate your clocking and returning the two (2) extra copies enclosed in the envelope provided. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,

A handwritten signature in black ink that reads "Tara Dawn Shurling". The signature is written in a cursive, flowing style.

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm
Enclosures

cc: Donald J. Zelenka, Assistant Deputy Attorney General (w/enclosures)
Julian Young, 352043 (w/enclosures)
Lee Smalls (w/enclosures)

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MAY 31 2013

SC Court of Appeals